

REMARKS

In the Notice of Non-Responsive Amendment, the Examiner pointed out that the art rejection based on Jiang was not discussed in the Amendment filed by applicants on May 17, 2006. In furtherance of the aforesaid Amendment, and in addition to it, applicants provide the following discussion of the Jiang reference and associated rejection.

Claims 1-76 are currently active.

The Examiner has rejected Claims 1-6, 16-19, 25 and 26 as being anticipated by Jiang. Applicants respectfully traverse this rejection.

Jiang teaches that the data movers are data mover computers. Each of the data mover computers has a respective high-speed data link to a respective port of the cached disk array. The cached disc array is configured so that the filesystem is accessible only through the dataport connected to the first data mover and so that the filesystem is accessible only through the dataport connected to the second data mover. Each of the data movers maintains a directory of the data mover ownership of all of the files in the first and second filesystems. In other words, each of the data movers maintains a copy of the filesystem configuration information in order to recognize which data mover in the system has exclusive access to a specified read/write file.

Each of the data movers may receive file access requests from at least one network client. The clients communicate with the data movers using a connection oriented NFS protocol. Whenever the data mover receives a file access request from the client, it checks the configuration directory to determine whether or not the file specified by the request is in a filesystem owned by the data mover. If so, then the data mover places a lock on the specified file, accesses the file in the filesystem, and streams read/write data between the client and the filesystem. If the file specified by the request is not a filesystem owned by the data mover, the data mover forwards the request to the data mover that owns the filesystem to be accessed. See column 1, line 63-column 2, line 49.

A further modification of the above architecture is achieved by including a data bypass path between the first data mover in the second filesystem in order to bypass the second data mover, and a data bypass path between the second data mover and the first filesystem in order to bypass the first data mover. It is possible for each of the data movers to access data in each of the filesystems, but if a data mover does not on the file access information for the filesystem to be accessed, and the data mover to ask the owner for permission to access the filesystem, or else a data consistency problem and arrives. See column 8, lines 30-42.

As is clearly evident from the above description, a data mover computer is not a switching fabric, as found in Claim 1. In fact, Jiang teaches to have bypass paths to connect a data mover to a filesystem precisely so it does not need to act as a switch. The very teaching of bypass paths connecting data movers to filesystems teaches away from the data movers acting as

switches, since if they acted as switches, they would not need the bypass paths. In fact, the plain language that Jiang uses is "data mover computer" and not a switch or a switching fabric. The language that the author uses must be given deference, unless there is a clear contrary definition provided to the standard definition. Accordingly, Jiang does not anticipate Claim 1 of applicants.

Claims 2-6 are dependent to parent Claim 1 and are patentable for the reasons Claim 1 is patentable.

Claim 16 is patentable for the reasons Claim 1 is patentable. Claims 17-19 are dependent to parent Claim 16 and are patentable for the reasons Claim 16 is patentable.

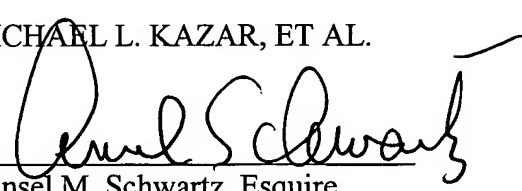
Claims 25 and 26 are patentable for the reasons Claim 1 is patentable.

In view of the foregoing amendments and remarks, it is respectfully requested that the outstanding rejections and objections to this application be reconsidered and withdrawn, and Claims 1-76, now in this application be allowed.

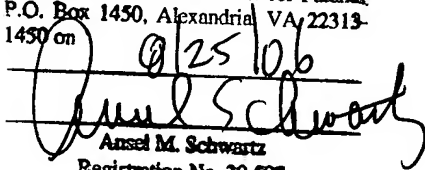
Respectfully submitted,

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